

November 30, 2016

Mr. John C. Bryant, Hydrogeologist
Corrective Action Section
South Carolina Department of Health
and Environmental Control
Bureau of Underground Storage Tank Management
2600 Bull Street
Columbia, South Carolina 29201



UST

Corrective Action Plan Island Car Wash 1008 William Hilton Parkway Hilton Head Island, South Carolina SCDHEC Site ID# 00990



Dear Mr. Bryant,

Midlands Environmental Consultants, Inc. (MECI) is pleased to submit the attached Corrective Action Plan (CAP) for the referenced site. This plan describes our proposed approach for site rehabilitative measures in general accordance with South Carolina Department of Health and Environmental Control (SCDHEC) guidelines.

Midlands Environmental appreciates the opportunity to offer our professional environmental related services to you on this project. Please feel free to contact us at 803-808-2043 if you have any immediate questions or comments.

Sincerely,

Midlands Environmental Consultants, Inc.

Kyle V. Pudrey Project Biologist

Bryan F. Shane, P.G. Principal Geologist

Post Office Box 854, Lexington SC 29071 • 231 Dooley Road, Lexington, SC 29073

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Figure 2 – SITE BASE MAP

Figure 4 – GROUNDWATER COC SITE MAP (TOTAL BTEX ISOPLETH)

Figure 4A – GROUNDWATER COC SITE MAP (NAPHTHALENE ISOPLETH)

Figure 4B – GROUNDWATER COC SITE MAP (OXYGENATES)

Figure 5 – POTENTIOMETRIC DATA SITE MAP (GROUNDWATER CONTOUR)

Figure 6 – PROPOSED INJECTION AREA

APPENDIX A – SITE SPECIFIC WORK PLAN (SSWP)
APPENDIX B – UNDERGROUND INJECTION PERMIT APPLICATION

1.0 PROJECT INFORMATION

The subject site (Island Car Wash) is located at 1008 William Hilton Parkway in Hilton Head, Beaufort County, South Carolina. The subject site formerly maintained three 10,000 gallon currently ranked a Class 2BB. product in December of 2005 and confirmed the release in January of 2006. The subject site is UST's were abandoned by removal from the ground in October of 2005. The South Carolina gasoline underground storage tanks (UST's) and one 10,000 gallon diesel UST. The subject Department of Health and Environmental Control (SCDHEC) reported a release of petroleum

The above information is based on reports and correspondence obtained from SCDHEC files and MECI field notes.

2.0 ASSESSMENT SUMMARY

dissolved phase contaminants appear to be located on the southwestern portion of the property in This could be a result of coastal processes. Groundwater elevation data reveals the groundwater flow from the release is currently semi-radial. the area of RW-2, RW-4, and MW-3R. The contaminants appear to be gasoline range constituents. at the subject site has been impacted by petroleum constituents. The highest concentrations of Based on the results from previous assessment activities, it appears that ground water (Figure 4/4A)

3.0 SITE REMEDIAL GOALS

phase CoC's for five groundwater monitoring wells: SCDHEC has outlined site rehabilitative goals and Site Specific Target Levels (SSTLs) for dissolved

Based on the most recent analytical data (September 28, 2016), monitoring well MW-3R and recovery wells RW-2, RW-3, and RW-4 currently contain dissolved CoC's greater than the established SSTLs. Naphthalene concentrations in recovery well RW-1 are also above the Risk Based Screening Levels (RBSL's).

4.0 PROPOSED REMEDIAL APPROACH

MECI proposes a rehabilitative approach composed of the direct injection of a pulverized activated carbon based product into the areas surrounding the recovery wells and monitoring well MW-3R to

reduce concentrations of petroleum hydrocarbons. Following the proposed injection activities, a 45 day stabilization period will ensue to allow for absorption of petroleum based contaminants to occur. Once stabilization has been met, three 96-hour Aggressive Fluid Vapor Recovery Events will be performed on wells RW-2, RW-4, and MW-3R to dewater the aquifer, remove contaminated groundwater, and to better spread injectant through the vadose zone.

The conceptual design of the proposed remediation system was developed based on our knowledge of existing site conditions, our knowledge of the remediation equipment recommended, and recognized success utilizing this technology at other sites with similar lithology. The individual components of the remediation procedure are outlined in the following sections.

Several remedial alternatives were evaluated to restore impacted soil and groundwater to SCDHEC prescribed concentrations. Constraints and limitations that affect site restoration include the types of contaminants, surface and subsurface site characteristics, concentration of subsurface utilities, and aboveground site utilization. The objective of any remedial evaluation is to present the most appropriate strategy for the subject site.

Injection of a pulverized carbon product into the specified areas of the contaminant plume will allow the carbon to absorb petroleum based contaminants, as well as provide a substrate for indigenous bacteria to colonize and regenerate the carbon *in-situ*. Injection at several different depths will allow for treatment of dissolved CoC's in the groundwater to address the downward and/or off-site migration of contaminants, and treatment of the vadose zone to prevent contamination rebound due to infiltration and season water table fluctuations. Injections of this type can have a radius of influence of between 3 to 20 feet, depending on soil conditions at the subject site. For design purposes, the radius of influence for each injection point is estimated at 20 feet.

Pilot studies conducted by the technology manufacturer indicate that in some cases, a single application of pulverized carbon provides significant reductions in contaminant concentrations within a relatively short time-frame (days to weeks). Some sites may required multiple applications or require longer periods of time before adequate reductions in contaminant concentrations are observed. In all cases, the reduction in contaminants will be affected by further releases, unidentified sources and ongoing influences to the injection area by surrounding contaminant plumes.

5.0 DESIGN AND OPERATION PROPOSED REMEDIAL APPROACH

The proposed injection event will be conducted in the vicinity of the recovery wells and monitoring well MW-3R. Sampling events will be conducted approximately 45 days following the final proposed AFVR event. This sampling event will determine the effectiveness of the proposed injection and AFVR events.

The proposed corrective action plan includes the injection of pulverized activated carbon into the contaminant plume, followed by supplemental AFVR events. The details of the remedial system are provided below.

5.1 DIRECT INJECTION

MECI proposes to inject a total of 2,000 pounds of pulverized activated carbon and 2,000 gallons of potable water (18,000 lbs. of slurry) into the desired smear zone. In each injection location, potable water will be mixed with the appropriated quantity of product and injected at 5 foot intervals using depth sets between 5, 10 and 15 feet below ground surface (BGS). Figure 6 shows the approximate

Corrective Action Plan – Island Car Wash SCDHEC Site ID# 00990

November 30, 2016 1008 William Hilton Parkway

location of the area where MECI proposes forty (40) direct injection points. A direct-push drilling rig, operated by a SC certified well driller, will be used to install the injection points. Injection rods will be pushed to the desired interval, the appropriate amount of pulverized activated carbon mixed with potable water will be injected, the rods will be pushed an additional five feet, and the process will continue to the termination depth. Flow rates will be adjusted to between 2 gallons per minute (gpm) and 10 gpm with average injection pressures between 10 pounds per square inch gauge (psig) and 60 psig. Injection pressures will not exceed 80 psig. Injections for the injection event should take between 3 and 5 days depending on site conditions.

During the injection event, should the product surface or enter monitoring wells, it will be removed using vacuum extraction. Once the injection process is complete the potential for surfacing of the product is eliminated.

5.2 AGGRESSIVE FLUID VAPOR RECOVERY EVENTS

Following a proposed 45 day injectant stabilization period, MECI proposes to conduct AFVR events to remove reduce dissolved petroleum compounds from the "smear zone" at the subject site. MECI's multi-phase extraction units will perform dual phase extraction to remove hydrocarbons (liquid and vapor phase) from wells RW-2, RW-4, and MW-3R at the subject site. MECI's AFVR units employ a combination of specially designed trailer-mounted vacuum and liquid handling knock out tank integrated with a vapor phase activated carbon unit. A vacuum is applied to multiple wells with a down hole apparatus (drop-tube) used to control the fluid elevation in each extraction well. During the event, the vacuum forcefully induces free phase petroleum product, contaminated groundwater, and vapor into the extraction wells from both the vadose zone above the water table and the saturated zone below simultaneously.

MECI's mobile extraction units are a trailer-mounted systems equipped with 40 kw (kilowatt) diesel Generator Sets which powers a 20 HP (horsepower) VMAX oil-sealed vacuum pump system (Model VMX0303K) which is capable of providing an air flow of 250 CFM (Cubic Feet per Minute) at 25 inches of Mercury, and a 2 HP Moyno 500 Series (Model 3913670100) transfer pump to off load fluids produced (see Figure 3). A mounted 480 Volt/3 Phase electrical control panel operates both the Vacuum pump system and the transfer pump. Prior to start-up of the AFVR event, a stinger (drop-tube) is inserted into the well and installed approximately 6 inches below the bottom of the product layer. A 2.5 inch Petroleum Flexwing hose is connected to both the well head connection and the trailer-mounted manifold which is connected to the fluid holding tank. Once start-up has commenced vapor phase volatile organic compounds (VOC's) are routed from the vacuum pump system to a vapor phase granular activated carbon vessel which filters the off-gas before discharging into the atmosphere.

6.0 SITE MONITORING AND SYSTEM EVALUATION

The effectiveness of the proposed remediation approach will be evaluated through groundwater sampling results.

The entire monitoring well network will be sampled approximately 45 days following the completion of proposed AFVR events. The wells will be sampled in accordance with SCDHEC's most recent Quality Assurance Program Plan for the Underground Storage Tank Management Division and MECI's most recent Standard Operating Procedures. Groundwater samples obtained will be analyzed for BTEX, Naphthalene, MtBE, 1,2-DCA, and 8-Oxygenates (EPA Method 8260-B).

w

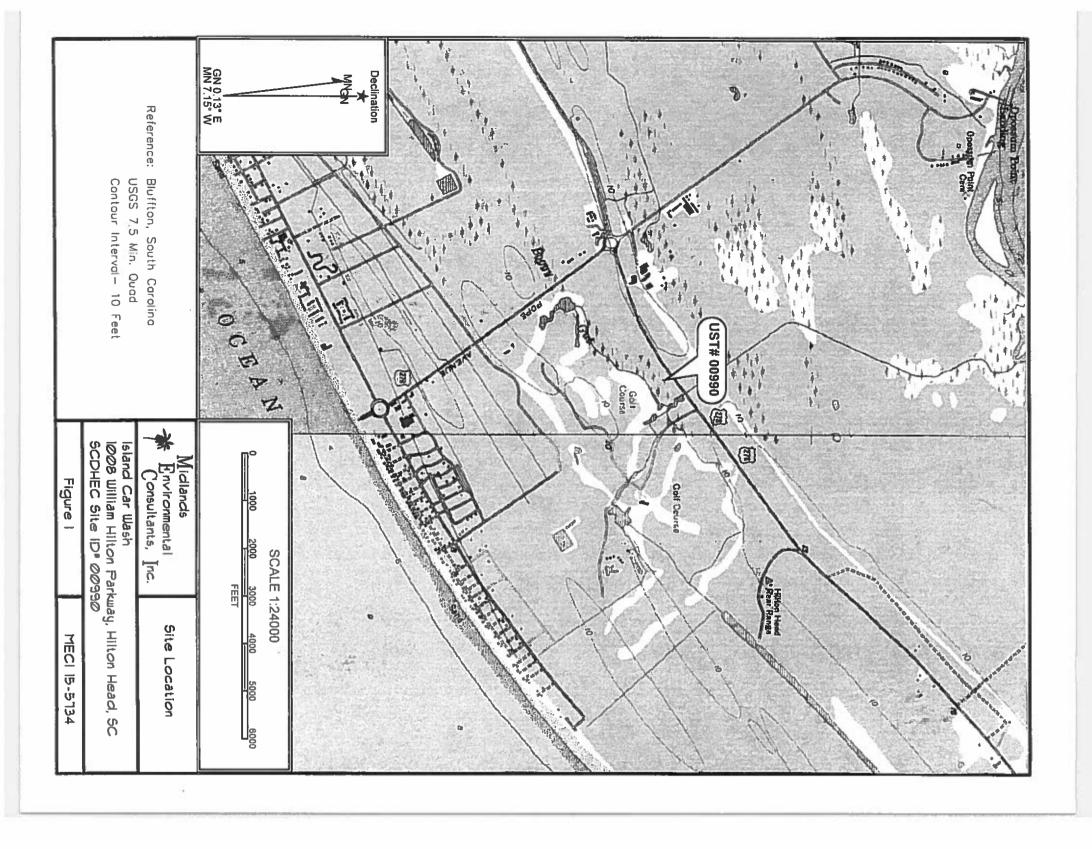
The follow table presents an approximate timetable for corrective action activities:

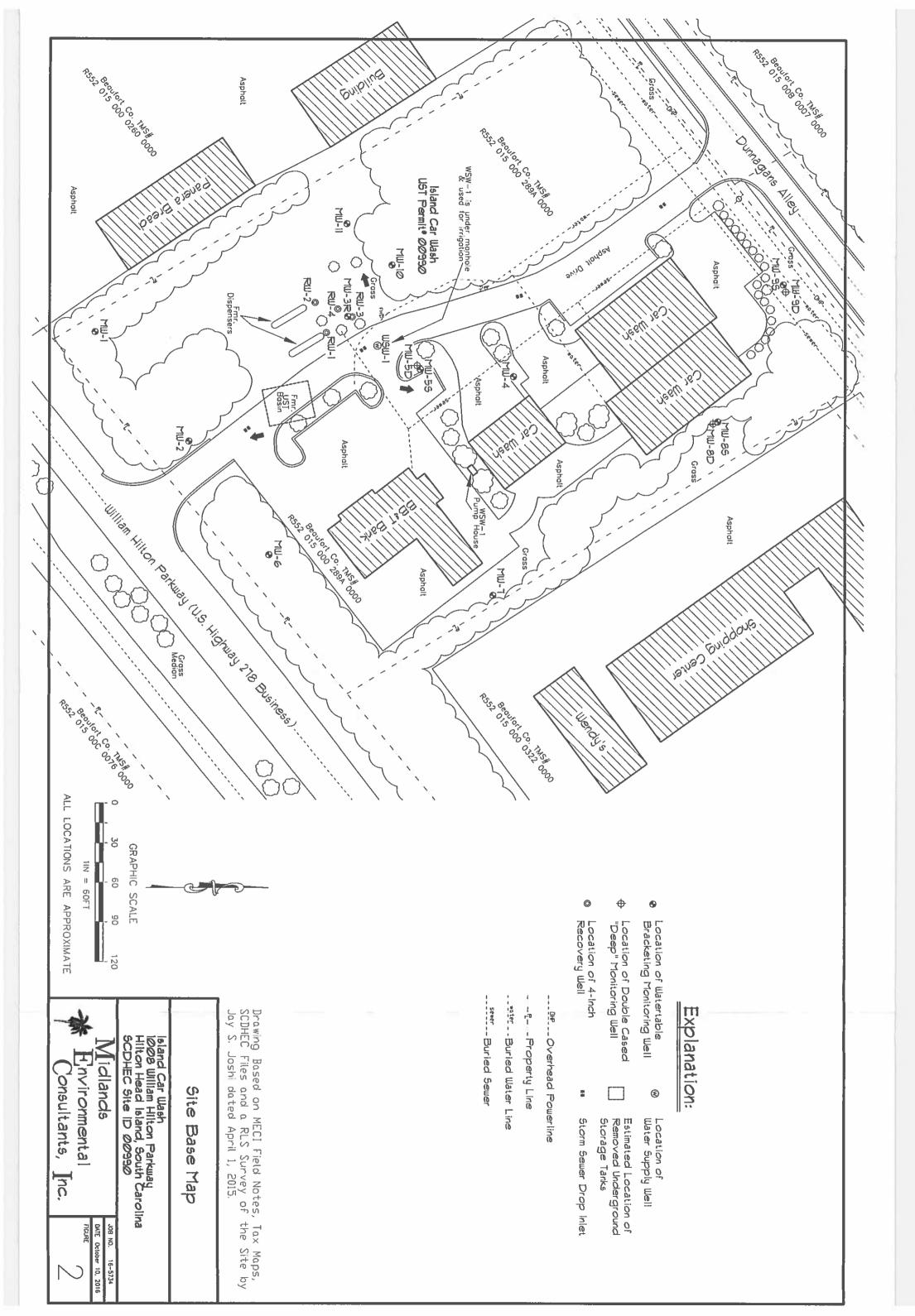
Item	Start Date	End Date	Comments
CAP Preparation	11/30/2016	12/1/2016	Completed
CAP Approval	12/1/2016	TBD (1/1/2017)	Awaiting Approval
CAP Implementation	1/1/2017	2/1/2017	Dependant upon approval
PAC Stabilization	2/1/2016	2/1/2017	Dependant upon injection completion
AFVR Event #1	3/20/2017	3/24/2017	Dependant upon injection completion
AFVR Event #2	3/27/2017	3/31/2017	Dependant upon injection completion
AFVR Event #3	4/3/2017	4/7/2017	Dependant upon injection completion
Groundwater	5/22/2017	6/13/2017	Dependant upon AFVR completion
Sampling			
Final Report Issued	6/13/2017	7/4/2017	Dependant upon sampling completion

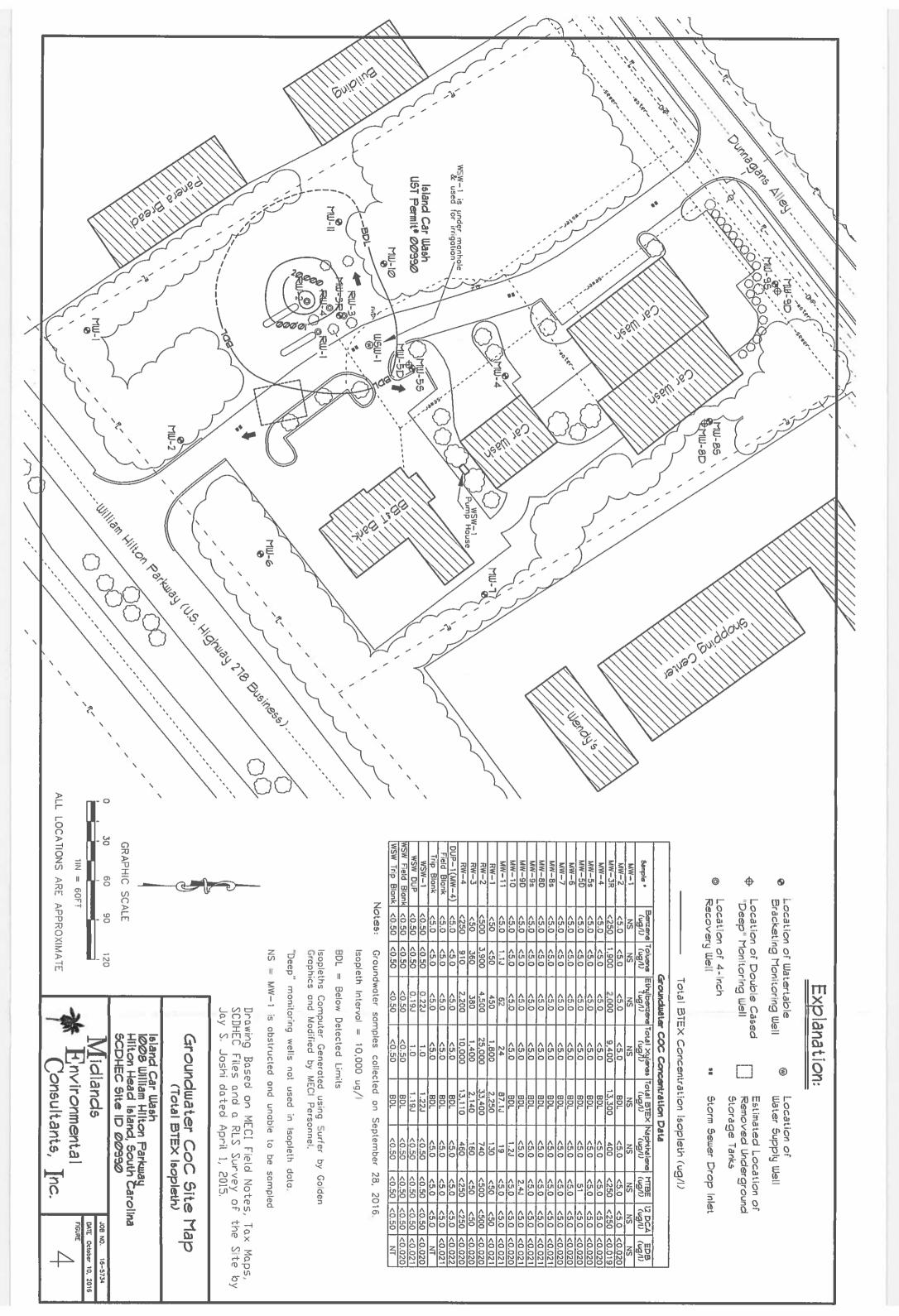
7.0 QUALIFICATIONS OF REPORT

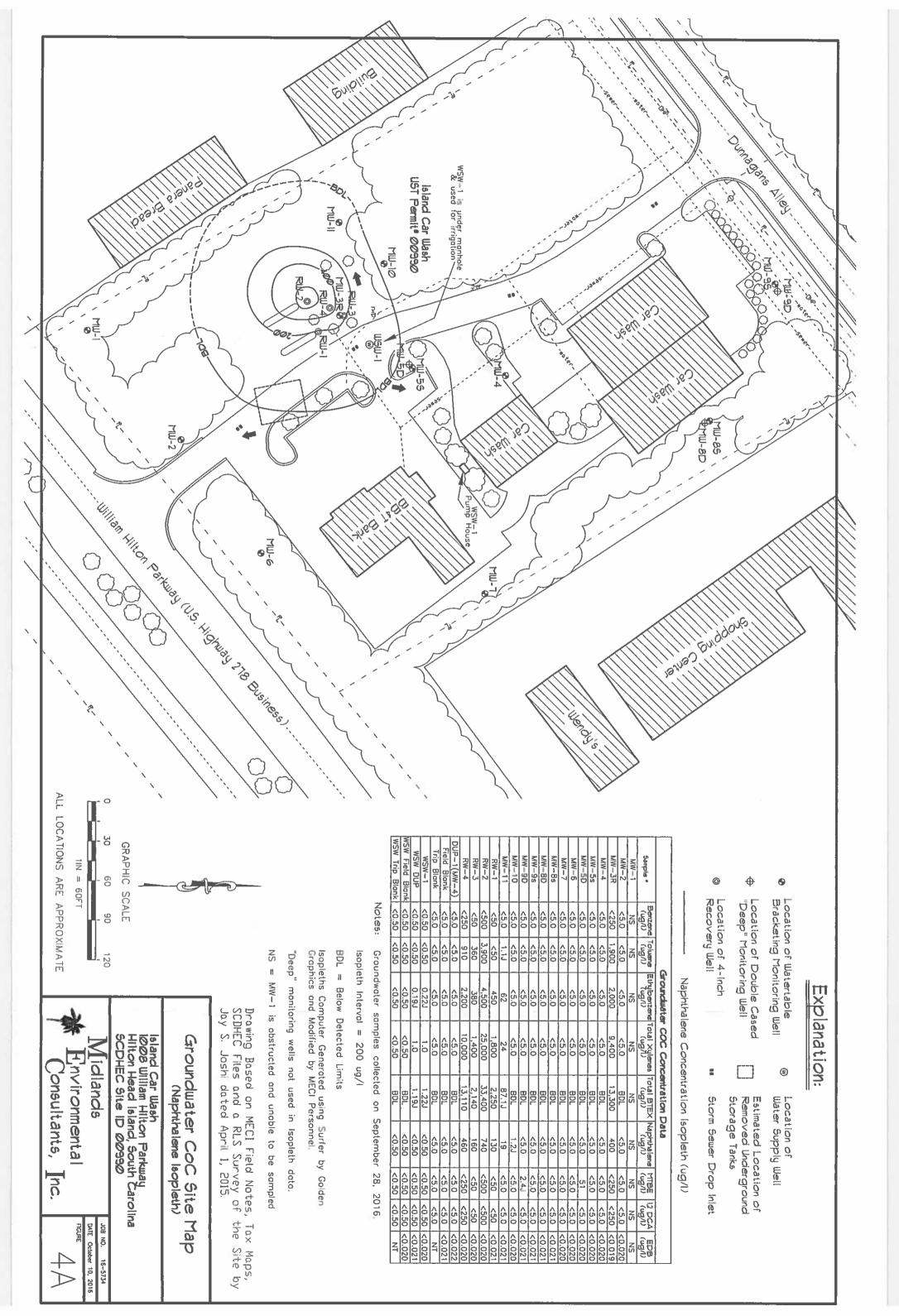
The activities and evaluative approaches used in this remediation proposal are consistent with those normally employed in hydrogeological remediation and waste management projects of this type. Our evaluation of site conditions has been based on our understanding of the site, project information provided to us, and data obtained in our exploration. The general subsurface conditions utilized in our evaluation have been based on interpretation of subsurface data between borings.

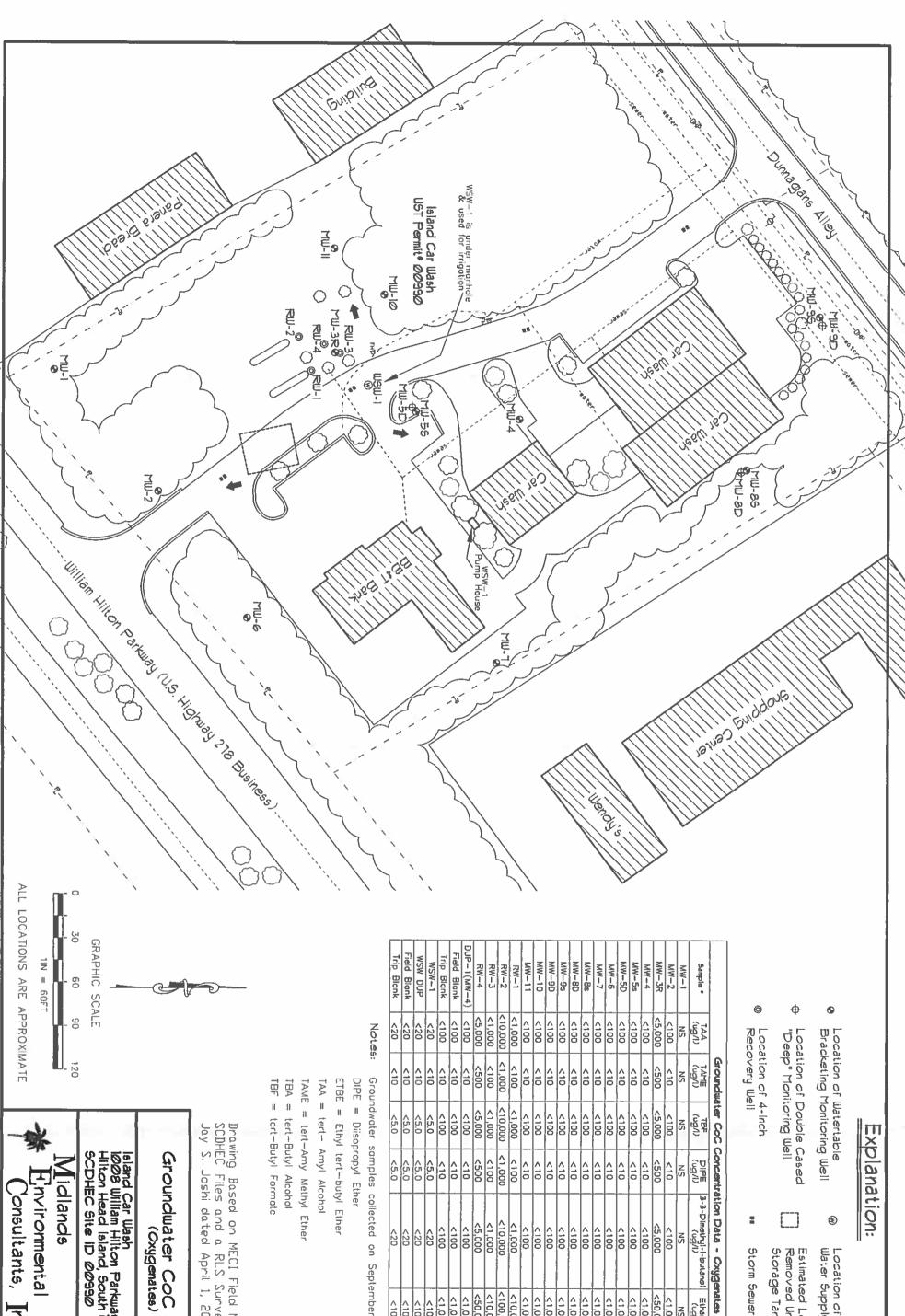
FIGURES











Explanation:

(3)

Location of Water Supply Well

- Estimated Location of Removed Underground Storage Tanks
- Storm Sewer Drop Inlet

	TAA	TAME	헆		3-3-Dinethul-I-but and	_	n n	T T
a d	(<u>P</u>	(rgu)	(ng/l)	(2g/s)	(ug/l)	(/gu)	(-\Bu)	
<u> -1</u>	SN	NS	SN	NS	NS	SS	SN	_1
-2	<100	<10	<100	<u>^10</u>	<100	<1,000	<u>^1</u> 0	
-3R	<5,000	<500	<5,000	<500	<5,000	<50,000	<5,000	
-4	<100	<10	<100	<10	<100	<1,000	<100	
-5s	<100	<10	<100	<10	<100	<1,000	<100	
-5 D	<100	<10	<100	<10	<100	<1,000	<100	
-6	<100	<10	<100	<10	<100	<1,000	^100	
-7	<100	<10	<100	<10	<100	<1,000	^100	
-Bs	<100	<10	<100	<10	<100	<1,000	<100	-
-80	<100	<10	<100	<10	<100	<1,000	<100	
-9s	<100	^10	<100	<10	<100	<1,000	<100	
90	<100	<10	<100	<10	<100	<1,000	<100	
-10	<100	<u>^10</u>	<100	<10	<100	<1,000	<100	
11	<100	<10	<100	<10	<100	<1,000	<100	1
1	<1,000	<100	<1,000	<100	<1,000	<10,000	<1,000	1
-2	<10,000	<1,000	<10,000	<1,000	<10,000	<100,000	<10,000	
<u>ل</u>	<1,000	<u><100</u>	<1,000	<100	<1,000	<10,000	<1,000	
-4	<5,000	<500	<5,000	<500	<5,000	<50,000	<5,000	
MW-4)	<100	<10	<100	<10	<100	<1,000	<100	
Blank	<100	<10	<100	<10	<100	<1,000	<100	- 7
Blank	<100	<10	<100	<10	<100	<1,000	<100	- 7
V-1	<20	<10	<5.0	<5.0	<20	<100	<1.0	1 7
DUP	<20	<10	<5.0	<5.0	<20	<100	<1.0	1 7
Blank	<20	<10	<5.0	<5.0	<20	<100	<1.0	1 7
Blank	<20	<u><1</u> 0	<5.0	<5.0	<20	<100	<1.0	1

Groundwater samples collected on September 28, 2016.

Diisopropyl Ether

= Ethyl tert-butyl Ether

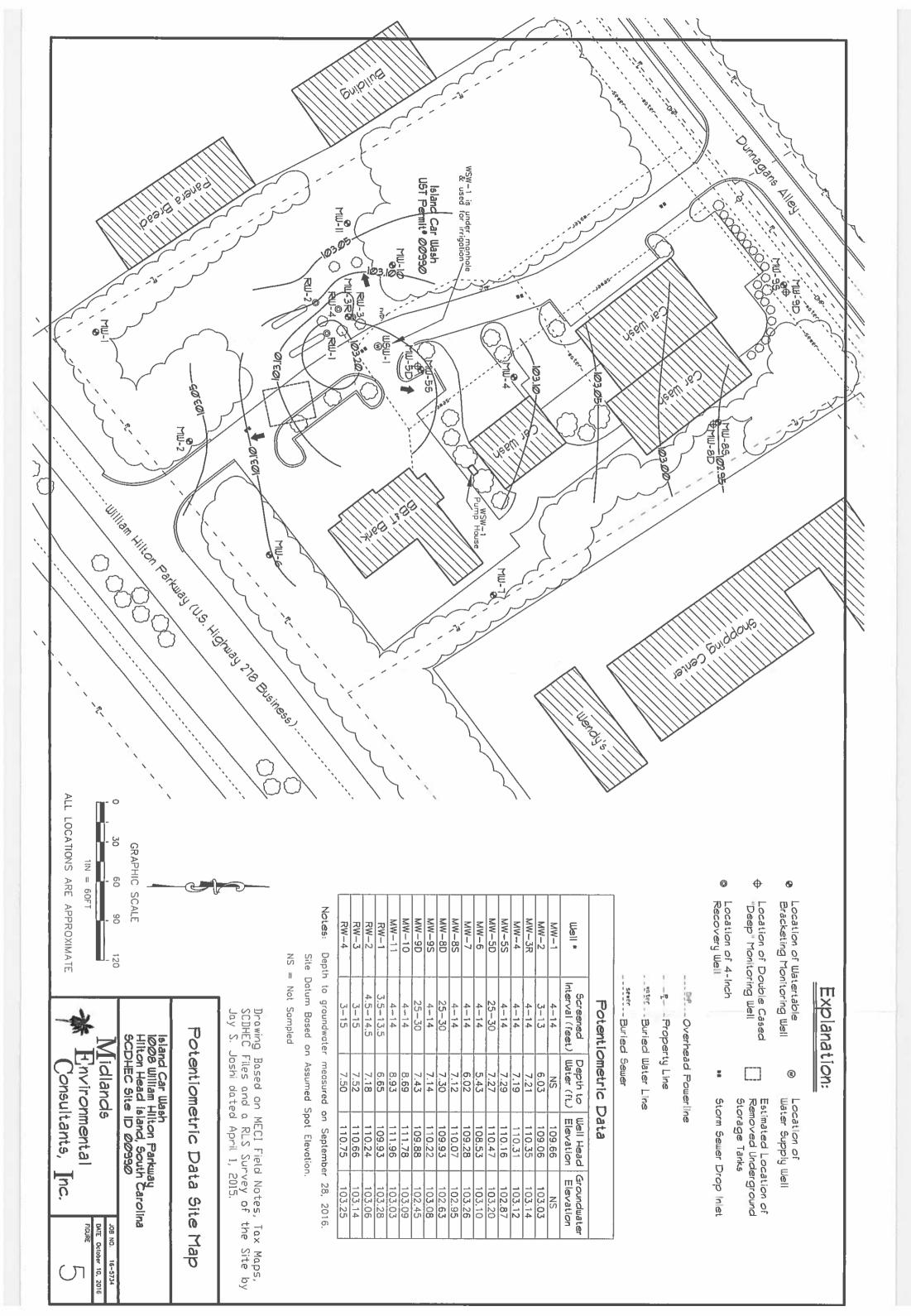
= tert-Amy Methyl Ether

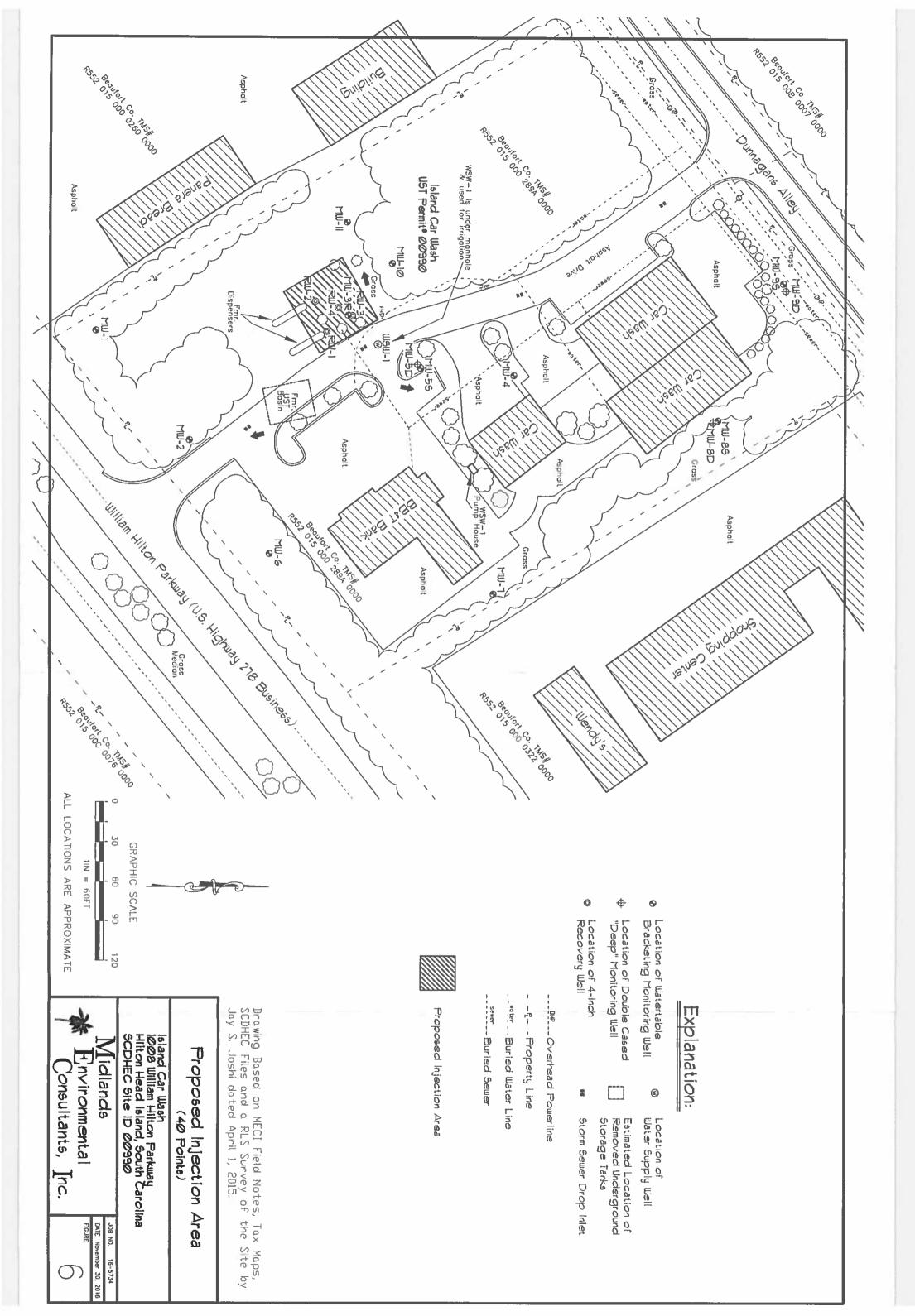
= tert—Butyl Formate

Drawing Based on MECI Field Notes, Tax Maps, SCDHEC Files and a RLS Survey of the Site by Jay S. Joshi dated April 1, 2015.

Groundwater CoC Site Map (oxygenates)

Island Car Wash 1008 William Hilton Parkway Hilton Head Island, South Carolina SCDHEC Site ID 00990 Midlands





SITE SPECIFIC WORK PLAN APPENDIX A





Site-Specific Work Plan for Approved ACQAP Underground Storage Tank Management Division

		nsistent with SOP):	pment method (co d:	Monitoring Well development method (consistent with SOP): Comments, if warranted:	
feet per point	lage:	Estimated Footage:		# of recovery wells:	
feet per point	tage:	Estimated Footage:		# of deep wells:	
feet per point	tage:	Estimated Footage:		# of shallow wells:	
ns on the attached map.	de their proposed location	Permanent Monitoring Wells Estimate number and total completed depth for each well, and include their proposed locations on the atta	g Wells otal completed de	Permanent Monitoring Wells Estimate number and total con	
			dology:	Field Screening Methodology:	
feet per point	Estimated Footage:	Estimate	sed:	# of deep points proposed:	
feet per point	Estimated Footage:	Estimate	posed:	# of shallow points proposed:	
ons on the attached man	ide their proposed locatio	Field Screening Methodology Estimate number and total completed depth for each point, and include their proposed locations on the attached man	odology otal completed de	Field Screening Methodology	
2 Trip Blank	2 Duplicate	Surface Water	Vells	18 Monitoring Wells	
collected.)	þe	(Estimate the number of samples of each matrix that are expected to	stimate the numb	tion	
				□ BTEXN	
E)	IPH-GRO (SUSUB/8015B)	Oll & Grease (9071)		2: 72:	
3 0	TPH-DRO (3550B/8015B)				_
l				Soil:	
	Other	_	무	□ PAH (8270D)	
□ Dissolved Iron	Sulfate		Hd1 🗆	Z EDB (8011)	
☐ Ethanol	Nitrate	8 RCRA Metals		Ø Oxygenates (8260B)	
☐ Methane	BOD			Z BTEXNMDCA (8260B)	
			Water:		
			(Please check all that apply)	Analyses (Please ch	_
		Monitoring Well Installation □	☐ Monitoring V	☐ Tier I	
□ GAC	Groundwater Sampling		☐ Tier II	□ IGWA	
		(vlaa	ise check all that a	Scope of Work (Please check all that apply)	
		× .	ty: Car Wash / Bar	Current Use of Property: Car Wash / Bank	
			SAS.	Property Owner Address: SA	
		10, 11 0000 T	SAA	Property Owner (if different): SAA	
773-286-0200	Phone: 773	E	Bershing Boad Cice	Responsible Party: Bell Fuels, Inc.	
		1008 William Hilton Parkway, Hilton Head Island, SC 29928	William Hilton Park	Facility Address: 1008	
t#: 00990	UST Permit #:		Car Wash	Facility Name: Island Car Wash	_
	UST Contractor Certification Number: 009		Environmental Consu	Contractor: Midlands Environmental Consultants, Inc.	
ַ סַ			ם	From: Mr. Jeff Coleman	
(SCDHEC Project Manager)				To: Mr. John Bryant	

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

DHEC 0653 (08/2013)

	1- 1-			
1. Attach a copy of the relevant portion of the USGS topographic map showing the site location. 2. Prepare a site base map. This map must be accurately scaled, but does not need to be surveyed. The map must include the following: North Arrow Location of property lines Location of buildings Previous soil sampling locations Previous monitoring well locations Proposed soil boring locations Location of all potential receptors Proposed soil boring locations	Name of Well Driller: SCLLR Certification Number: N/A Other variations from ACQAP. Please describe below.	pliance With Annual Contractor Quality Assurance Laboratory as indicated in ACQAP? (Yes/No) Name of Laboratory: SCDHEC Certification Number: Name of Laboratory Director:	Soil: Soil: Fluids: Gallons Free-Phase Product: Gallons Additional Details For This Scope of Work For example, list wells to be sampled, wells to be abandoned/repaired, well pads/bolts/caps to replace, details of AFVR event, etc. Sampling activities will be performed following injection and AFVR activities.	Implementation Schedule (Number of calendar days from approval) Field Work Start-Up: Dependant Field Work Completion: Dependant Field Work Completion: Dependant Field Work Completion: Supendant Field Work Completion: Dependant Field Work Completion: Supendant Field Work Completion: Supendant Field Work Completion: Dependant Field Work Completion: Supendant Fiel

DHEC 0653 (08/2013)

3. Assessment Component Cost Agreement, SCDHEC Form D-3664



ASSESSMENT COMPONENT COST AGREEMENT
SOUTH CAROLINA

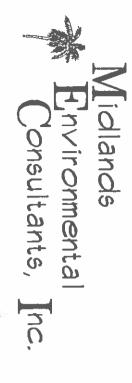
Department of Health and Environmental Control
Underground Storage Tank Management Division
State Underground Petroleum Environmental Response Bank Account
August 16, 2016

raciilly Mailie. Islatiu Cal Wasii			•	
UST Permit #: 00990	Cost Ag	Cost Agreement #:	Proposal	,
ITEM	QUANTIT	TINU	UNIT PRICE	TOTAL
		3	9	2000
R1 Tay Man	-	each	\$70.00	\$0.00 \$0.00
C1. Tier II or Comp. Plan /QAPP Appendix B	dix B	each	\$250.00	\$0.00
2. A1. Receptor Survey *		each	\$551.00	\$0.00
3. Survey (500 ft x 500 ft)				
A1. Comprehensive Survey		each	\$1,040.00	\$0.00
B. Subsurface Geophysical Survey				
18. < 10 meters below grade		each	\$1,300.00	\$0.00
C1. Geophysical UST or Drum Survey		each	\$2,310.00	\$0.00
4. Mob/Demob				
A1. Equipment	·	each	\$1,020.00	\$1,020.00
C1. Adverse Terrain Vehicle	٥	each	\$500.00	\$0.00
5. A1. Soil Borings (hand auger)*		foot		\$0.00
6. Soil Borings (requiring equipment, push technology, etc)* or	sh techno	logy, etc)* o	r sample of	
AA. Standard (moraling music compression lengths) con gue cample, con	600	ner foot	\$15.00	\$9,000,00
C1. Fractured Rock	o o	per foot	\$20.20	\$0.00
7. A1. Soil Leachability Model		each	\$60.00	\$0.00
A1. 2" diameter or less	600	per foot	\$3.10	\$1.860.00
B1. Greater than 2" to 6" diameter		per foot	\$4.50	\$0.00
C1. Dug/Bored well (up to 6 feet diameter)	, ,	per foot	\$15.00	\$0.00
9. Well Installation (per foot)*		1	2000	***
B1. Water Table (drill rig)		per foot	\$38.00	\$0.00
CC. Telescoping		per foot	\$50.00	\$0.00
		per foot	\$58.00	\$0.00
		per root	\$30.90	\$0.00
HH. Recovery Well (4" diameter)		per foot	\$45.00	\$0.00
II. Pushed Pre-packed screen (1.25* dia)	<u>.</u>	per foot	\$15.00	\$0.00
J1. Rotosonic (2" diameter)		per foot	\$44.00	\$0.00
10. Groundwater Sample Collection / Gauge Depth to Water or Product	ige Depti	to Water or	Product *	\$0.00
A1. Groundwater Purge	18	er well/recept	\$60.00	\$1,080.00
B1. Air or Vapors		per recepto	\$12.00	\$0.00
C1. Water Supply	o	er well/recept	\$22.00	\$22.00
F1. Gaung Well only	N	er well/recept	\$28.00	\$56.00 \$0.00
F1. Sample Below Product		per well	\$12.00	\$0.00
G1. Passive Diffusion Bag		each	\$26.00	\$0.00
H1. Field Blank	2	each	\$24.60	\$49.20

ctive Action	21. IGWA (Úse DHEC 3666 form)	20. Tier I Assessment (Use DHEC 3665 form)	18. Miscellaneous (attach receipts)	D1. Drilling fluids		17. Disposal (gallons or tons)* AA. Wastewater 200	16. A1. Subsequent Survey*	A. Tier I Risk Evaluation B1. Tier II Risk Evaluation	15. Risk Evaluation	A1. Mathematical Model R1 Computer Model	13. A1. Free Product Recovery Rate Test*		A1. Pumping Test*	21. Hydrocarbon Fuel Identification	Y1. BTEX + Naphthalene	11. Analyses-Air	W1. Grain size/hydrometer X1 Total Organic Carbon	V1. TPH- GRO (5030B/8015C)	U1. TPH-DRO (3550C/8015C)		Q1. BTEX + Naphth.	O. RCRA METALS (200.8)	EDB (504.1)	L. BTEXNM+1,2 DCA (524.2) 4	-		II. PH		G1. 8 RCRA Metals		D1. PAH's	C2. Trimethal, Butyl, and Isopropyl Benzenes	AA1. Lead, Filtered	11. Laboratory Analyses-Groundwater A2. BTEXNM+Oxyg's+1,2 DCA+Eth(82 21
PFP Bid	standard	standard	each each	gallon	gallon	gallon	each	each each		each	each	per test	per hour	per sample	per sample	001	per sample	per sample	per sample	per sample	per sample	per sample	per sample	per sample		per sample	per sample	per sample	per sample		per sample	per sample	per sample	per sample
			\$0.00 \$0.00	\$60.00 \$0.42	\$0.50	\$0.56	\$260.00	\$300.00 \$100.00		\$100.00	\$38.00	\$100.00	\$23.00 \$191.00	\$357.00	\$216.00	400.00	\$104.00 \$30.60	\$35.96	\$40.00	\$64.04	\$64.00	\$100.00	\$79.50	\$124.05 \$91.75		\$14.80	\$5.20 \$0.00	\$41.00	\$63.40	\$45.20	\$60.60	\$36.40	\$13.80	\$122.00
\$0.00	\$0.00	\$0.00	\$0.00 \$0.00	\$0.00	\$0.00	\$112.00	\$0.00	\$0.00 \$0.00	***************************************	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	***************************************	\$ \$0.00 0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$238.50	\$496.20 \$367.00		\$0.00	\$0.00	\$0.00	\$0.00	\$904.00	\$0.00	\$0.00	\$0.00	\$2,562.00

\$0.00 \$0.00 \$0.00 \$11,472.35 \$107,075.25				. 4 1 1 1
\$0.00 \$0.00 \$0.00 \$11,472.35				TOTAL
\$0.00	\$95,602.90	percent	12%	Report Prep & Project Management
\$0.00	\$12.00	each	æ	K1. Replace missing/illegible well ID plate
\$0.00	\$130.00	each		J1. Convert Stick-up to Flush-mount*
2000	\$150.00	each		II. Convert Flush-mount to Stick-up*
\$0.00	\$134.00	each		H1. Replace/Repair stick-up*
\$0.00	\$15.00	each		G. Replace locking well cap & lock
\$0.00	\$2.60	each		F1. Replace well cover bolts
\$0.00	\$118.00	each		D1. Repair well vault*
\$0.00	\$88.00	each		C1. Repair 4x4 MW pad*
\$0.00	\$50.00	each		B1. Repair 2x2 MW pad*
\$0.00	\$50.00	each	vered	A1. Additional Copies of the Report Delivered
				25. Well Repair
\$0.00	\$1.50	foot		G1. Additional piping & fittings
\$0.00	\$150.00	each		F. In-line particulate filter
\$0.00	\$250.00	each		E1. GAC System housing*
\$0.00	\$275.00	each	hment*	DD. GAC System removal, cleaning, & refurbishment*
\$0.00	\$350.00	each	-	C1. Filter replacement/removal*
\$0.00	\$900.00	each		BB. Refurbished GAC Sys. Install*
\$0.00		each		
	on & service:	m installatio	filter syste	24. Granulated Activated Carbon (GAC) filter system installation &
\$1,174.50	\$391.50	each	ယ	G. AFVR Mobilization/Demobilization
\$35,200.00	\$0.44	gallon	80,000	F1. Effluent Disposal
\$0.00	\$25.75	each		E1. Additional Hook-ups
\$0.00	\$203.25	each		D. Site Reconnaissance
\$2,340.00	\$780.00	per event	ယ	C4. Off-gas Treatment 96 hour
\$0.00	\$327.00	per event		C3. Off-gas Treatment 48 hour
\$0.00	\$241.50	per event		C2. Off-gas Treatment 24 hour
\$0.00	\$122.50	per event		C1. Off-gas Treatment 8 hour
\$37,702.50	\$12,567.50	each	ယ	A4. 96-hour Event*
\$0.00	\$6,265.00	each		A3. 48-hour Event*
\$0.00	\$3,825.00	each		AA, 24-hour Event*
\$0.00	\$1,375.00	each		A1. 8-hour Event*
			(AFVR)	23. Aggressive Fluid & Vapor Recovery (AFVR)





November 30, 2016

Bruce Crawford
Underground Injection Control Program
Bureau of Water
2600 Bull Street
Columbia, SC 29201

Subject: Underground Injection Control Permit Application
Island Car Wash

1008 William Hilton Parkway Hilton Head Island, SC SCDHEC Site ID# 00990

Dear Mr. Crawford,

Midlands Environmental Consultants, Inc. (Midlands Environmental) is pleased to submit the attached Underground Injection Control Permit Application for the subject site.

Midlands Environmental has been awarded a remediation by SCDHEC to remediate petroleum impacted groundwater at the subject site. MECI proposes a supplemental rehabilitative approach composed of direct injection of a pulverized activated carbon based product into the areas surrounding the recovery wells and MW-3R to further reduce concentrations of petroleum hydrocarbons. A direct-push drilling rig, operated by a SC certified well driller, will be used to install the injection points. Injection rods will be pushed to a first interval, the appropriate amount of activated carbon based product mixed with potable water will be injected, the rods will be pushed an additional five feet, and the process will continue to the termination depth. The deepest injection interval at each point will be 15 feet below ground surface (BGS). During the injection event, should the product surface or enter monitoring wells, it will be removed using vacuum extraction. The product is not hazardous and only presents a dust nuisance if it surfaces. Once the injection process is complete the potential for surfacing of the product is eliminated.

Our current scope of work will be to conduct an injection event to further reduce dissolved phase CoC's at the site. The proposed injection event will include forty (40) injection points, with three (3) 5-foot injection intervals per point. At each injection point, fifty (50) gallons of potable water will be mixed with an appropriate amount of a pulverized activated carbon based product. The exact proportions of water to the pulverized activated carbon based product will be determined on-site, but it is anticipated to be a one to one ratio with 50 pounds of pulverized activated carbon mixed with 50 gallons of water. An approximate total of 2,000 pounds of pulverized activated carbon based product will be injected during the injection event. The proposed injection event should take between 3 and 5 days depending on site conditions.

Post Office Box 854, Lexington SC 29071 • 231 Dooley Road, Lexington, SC 29073
Telephone: (803) 808-2043 • fax: (803) 808-2048

November 30, 2016 SCDHEC UST Site ID# 00990

beyond which are commercial properties. Dunnagans Alley borders the site to the north, beyond which a western portion of the property. William Hilton Parkway forms the southern border of the property, Highway 278 Business) and Arrow Road. Currently the subject property contains a BB&T Bank and Car Wash in the eastern portion of the property and the former gasoline service station was located in the recreational resort. Commercial properties are located to the east and west of the subject site. The site is located approximately 1/4-mile east of the intersection of William Hilton Parkway (U.S.

The following attachments are included:

Attachment H-1 - Topographic map

Attachment H-2 - Scaled site map that includes all monitoring wells in the area of the subject site Attachment H-4 - Groundwater CoC Site Map (TOTAL BTEX ISOPLETH)

Attachment H-4A - Groundwater CoC Site Map (NAPHTHALENE ISOPLETH)

Attachment H-4B - Groundwater CoC Site Map (OXYGENATES)

Attachment H-5 - Potentiometric data site map

Attachment H-6 - Proposed Injection Area

Application. In addition to the attached figures, please find the completed Underground Injection Control Permit

Midlands Environmental appreciates your time in consideration of this application. If we could be of any assistance please feel free to call me at (803) 808-2043.

Sincerely,

Midlands Environmental Consultants, Inc.

Page 2

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	(אאאים	D. Date Signed (אואיסט/ץץץץ)			7	Signature —
	(803) 808-2043	(803)	Principal Geologist	Principa	P.G.	
		B. Phone No.	Title	•	Print)	Name (Type or Print)
and all attachments rmation is true, of a fine and	bmitted in this document on, I believe that the infor h, including the possibility	I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a imprisonment.	xamined and am famili- mediately responsible f nificant penalties for su	have personally ose individuals in that there are sign	ity of law that I ny inquiry of th lete. I am awar	I certify under pens and that, based on a accurate, and comp imprisonment.
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plete and submit on a nd include with your	asses 11, 111, and V, comp er which are applicable a	Complete the following questions on a separate sheet(s) and number accordingly; see instructions for Classes 11, 111, and V, complete and submit on a separate sheet(s) attachments by letter which are applicable and include with your application.	s) and number accordin ach maps where require	1 a separate sheet(15 appropriate. At	ing questions or achments A-U s	emplete the follow parate sheet(s) att plication.
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			e Center of field or Project	Wells or Approximate	of Wells or	VIII. Location of
er of Wells per type 40	Y', explain D. Number of	뎐	crass and Type of Well (see reverse) crode(s) C. If class is "other" or type is co	B. Type(s) enter code(s)		A. Class(es) enter code(s) V.A
C. Proposed	B. Modification/Conversion	B. Modification	(מאראיםם)	Date Started (MM/DD/YYYY)	1	A. Operating
				B or C)		VI. Well Status (Select A,
				E. Other (Explain)	in in	D. Public
			X C. Private	State	□ B.	A. Federal
		V. SIC Codes		(Select One)	Status (Selec	IV. Ownership Status
29073	South Carolina	Lexington	29928		d South Carolina	Hilton Head Island
Zip Code	State	City	Zip Code		State	City
	ad.	231 Dooley Road		kway	eet Address 1008 William Hilton Parkway	1008 Willian
s, Inc.	Midlands Environmental Consultants, Inc.	Midlands Enviro	Site ID# 00990	SCDHEC UST Site		Island Car Wash,
	ne	Owner/OperatorName				Facility Name
	tor and Address	III. Owner/Operator		dress	me and Address	II. Facility Name
		Comments	Сот			
				-		
	Permit Well Number	Permit		Date Received month day year	proved year	Application Approved month day year
	starting.	before Only	Read attached instructions For OfficialUse	Ro		
		Ü	Fermit Application Ground-Water Protection Division (Collected under the Authority of Title 48 Chapter I of the 1976 South Carolina Code of Laws)	Permit Application Id-Water Protection I under the Authority of Title 1976 South Carolina Code of	Groun (Collected of the	UIC
T/A C			Underground Injection Control	erground Inj	Und	-
1	EPA ID NUMBER	I. EPA ID 1				Form
			ù	;		

Well Class and Type Codes

Type Type	Class V.B	Туре	Class V.A	Class IV	Туре	Class III	Туре	Class II	Class I
"A" Heat pump return flow wells "B" Cooling water return flow wells	Non-contact return flow system wells	"A" Storm runoff drainage wells "B" Aquifer recharge wells "C" Salt-water intrusion barrier wells "E" Backfill wells associated with subsurface mining "F" Geothermal energy recovery wells "G" Experimental technology well "H" Natural gas storage wells "I" Corrective action wells	Injection wells not included in Class I, II, III, IV or V.B	Hazardous or radioactive waste disposal injection wells. (Prohibited)	"G" Solution mining well "S" Sulfur mining well by frasch process "U" Uranium mining well (excluding solution mining of conventional mines) "X" Other Class III wells	Special process injection wells.	e "D" Produced fluid disposal well "R" Enhanced recovery well "R" Hydrocarbon storage well (excluding natural gas) "X" Other Class II wells	Oil and gas production and storage related injection wells.	Industrial, municipal, and other injection wells for the subsurface disposal of fluids. (Prohibited)

Instructions for Attachments to Form 1 Underground Injection Control for Corrective Action Wells (effective 01/91)

The following ATTACHMENTS should be submitted with an underground injection control (UIC) permit application for Class V.A. corrective action wells associated with aquifer remediation that are to be used to inject fluid whose chemical constituents are below all drinking water standards, as established under R.61-58.5.

Attachment A: Activity for Review

Submit a brief description of the activities to be conducted that require a UIC permit.

Attachment B: Well Construction Details

Submit schematic or other appropriate drawings of the surface and subsurface construction details of the recovery and injection wells.

Attachment C: Operating Data

Submit the following proposed operating data for each injection well:

- Average and maximum daily rate and volume of fluid to be injected. In addition, indicate the average and maximum
 daily rate and volume of fluid to be withdrawn from <u>each</u> recovery well. Verification of the aquifer's hydraulic ability
 to produce and accept the quantities proposed should be presented.
- Average and maximum injection pressure.
- 3) Pumping schedule (i.e. continuous, alternating cycles, etc.).
- 4) Proposed ranges in the concentration of all contaminant constituents within the injection fluid. Include comprehensive ground-water quality data from a "worst case" well sample.
- 5) Length of time the project is expected to require injection to complete remediation (to ensure the effective dates of the permit will allow sufficient time to complete the project).

Attachment D: Monitoring Program

Discuss the planned monitoring program in detail:

- l) Include a discussion of monitoring devices, sampling frequency (sufficient to verify treatment system efficiency), sampling protocol, sampling location, parameters to be analyzed, and proposed method(s) of analysis.
- 2) This plan should indicate how, through monitoring, the proposed contaminant levels in the injectate will be verified.
- 3) This plan should also clearly illustrate exactly how hydraulic control of the contaminant plume (and injectate, where relevant) will be verified through monitoring (i.e., piezometers, quality analyses, etc.).

Attachment E: Existing or Pending State/Federal Permits

List the program and permit number of any existing State or Federal permits for the facility (i.e., NPDES, RCRA, UST, etc.).

Attachment F: Description of Business

Give a brief description of the nature of the business of the facility and any immediately adjacent facilities.

Attachment G: Area of Review

 The area of review should be a fixed radius of 1/4 mile from the injection well, the outermost injection wells (if a wellfield).

 If a fixed radius is not selected, the methods and the calculations used to determine the size of the area of review should be submitted.

Attachment H: Maps of Wells and Area of Review

- Submit a topographic map of the area, extending one mile beyond the project property boundaries. This map should show all hazardous waste treatment, storage, or disposal facilities, and all intake and discharge structures associated with the project facility. Any known areas of soil and/or ground-water contamination within a one mile radius should be indicated. Also indicate all surface bodies of water, springs, mines (surface and subsurface), quarries, and other pertinent surface features such as residences, roads, and geologic faults (known or suspected).
- A scaled map(s) should be included which shows the name and/or number and the location of ALL production, injection, monitoring, abandoned and dry wells within the area of review. This should be accomplished by file and field surveys. Information regarding the construction (i.e., total depth, diameter, casing/screened intervals, grouting, etc.) and the current status (i.e., actively used, temporarily abandoned, permanently abandoned) of ALL wells within the area of review should be submitted. If any wells have been abandoned, details on the method the wells were abandoned (i.e., cemented/grouted, filled with sand, etc.) should be included.
- 3) A potentiometric map of the project site should be submitted which accurately locates all monitoring wells and proposed recovery and injection wells and outlines the horizontal extent of both the free-phase contaminant (where applicable) and dissolved contaminant plumes. Include all water level and product thickness data. The date and time that water levels and product thicknesses were measured should be indicated.

Attachment I: Cross Sections/Diagrams

- Geologic cross sections indicating the lithology and stratigraphy of the site and the horizontal and vertical extent of
 the contaminant plume, should be submitted. At least two stratigraphic cross sections, one parallel and one perpendicular to the horizontal ground-water flow direction, should be submitted. In areas where the site stratigraphy is
 complex, additional cross sections should be submitted to clearly illustrate the local conditions.
- A schematic diagram, in the form of a cross section, showing the proposed remediation system with the components of flow (above and below ground) and all associated appurtenances (i.e., stripping tower, piping, wells, etc.).

Attachment J: Name and Depth of Underground Sources of Drinking Water (USDW's)

Identify and describe all aquifers which may be affected by the injection.

Attachment K: Hydraulic Control

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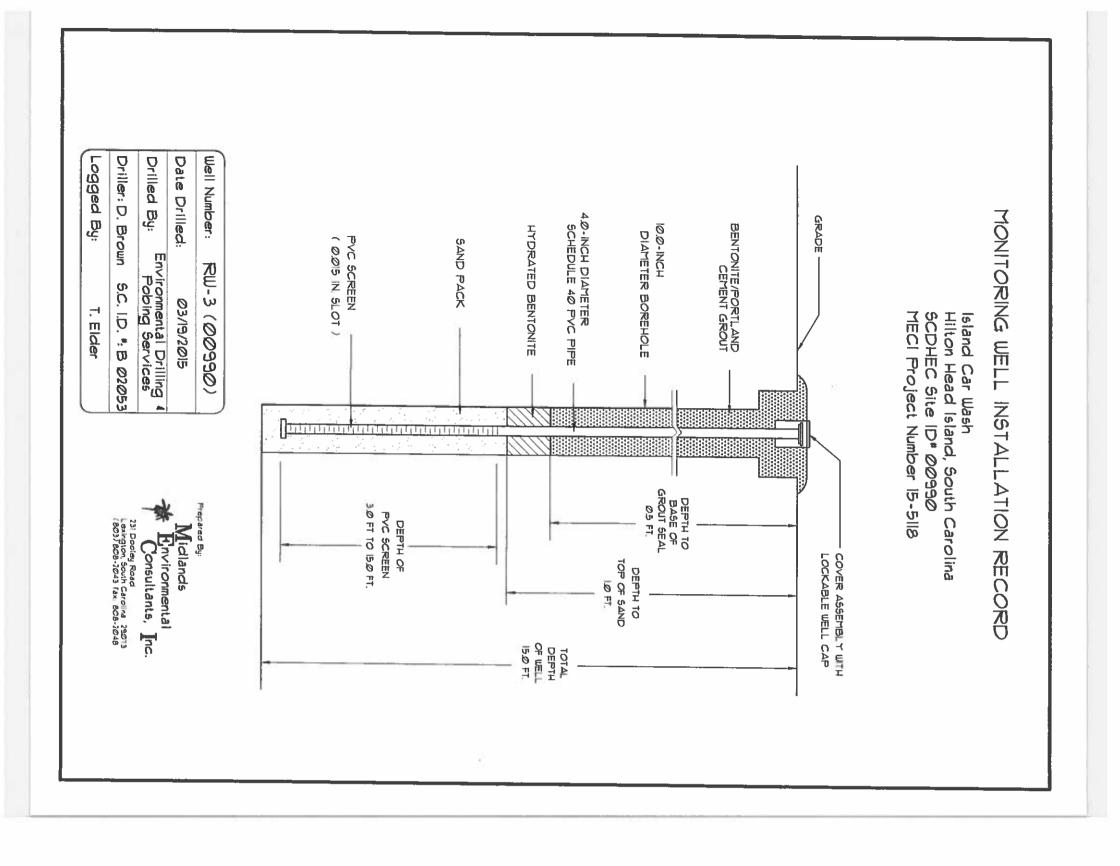
- Sufficient supporting data (i.e. time/drawdown data, Theis curves and methods, calculations, etc.), used to determine aquifer characteristics to verify <u>complete</u> hydraulic control over the contaminant plume (and injectate, if proposed injectate quality does not conform to classified ground-water standards) during injection should be submitted. At a minimum, values should be given for transmissivity, hydraulic conductivity, effective porosity and specific yield.
- 2) Demonstrate the presence and magnitude of, or the absence of, any vertical hydraulic gradient at the site. If a vertical hydraulic gradient exists, show how its direction and magnitude are incorporated in the calculations demonstrating hydraulic control.
- Ground-water flow computer models (especially 2-D map view with potentiometric and flow lines) may be utilized and submitted. All calculations should be in English units. All model-derived data and maps should be properly labeled and keyed so as to be clearly understood.

Subsequent Action

After receipt of a complete Underground Injection Control Permit Application, the Department will make a determination to deny or issue a <u>Permit to Construct</u> the injection well(s). After the well(s) is/are constructed, the Department should be notified in writing of the well(s) completion and sent a copy of the completed well record form(s) signed by a South Carolina certified well driller which illustrates the "as built" well construction. If the system is in compliance with the approved application, the Department may then issue an <u>Approval to Operate</u>. This Approval to Operate is the final permission necessary prior to injection.

Attachment I

TEST BORING RECORD Island Car Wash SCDHEC Site ID* 00990 MECI Project Number 15-5118 Hilton Head Island, SC 35-30-25 20-10_ 51 Boring Terminated at 15.0 Feet Below Ground Surface (BGS). Recovery Well Installed to 15.0 Feet BGS. Groundwater Measured at 6.04 Feet Below Top of Casing on March 23, 2015. COASTAL PLAIN SEDIMENT: Tan and Gray, Medium SAND Grass with Topsoil Description Drilled By: Boring Number: Date Drilled: ogged By: 67.2 74.9 50.5PID PPM Well Diagram 0 N Environmental Drilling Probing Services RW-3 (00990) 03/19/2015 T. Elder Ġ 10 NO Midlands
Environmental
Consultants, Inc. BLOWCOUNTS Penetration Blows Per Foot 20 40 60 Prepared By: 231 Dopiey Road Lexington, South Carolina 25073 (803) 806-2043 Tax: 808-7048 RECORDED 60 80 100



Island Car Wash
Hilton Head Island, SC
SCDHEC Site ID* 00990
MECI Project Number 15-5118 TEST BORING RECORD 35 30-20-25-10 5 Boring Terminated at 15.0 Feet Below Ground Surface (BGS). Recovery Well Installed to 15.0 Feet BGS. Groundwater Measured at 6.17 Feet Below Top of Casing on March 23, 2015. COASTAL PLAIN SEDIMENT: Tan and Gray, Medium SAND Grass with Topsoil Description Drilled By: Date Drilled: Boring Number: Logged By: 102.5 90.1 83.4 PID Well Diagram N Environmental Drilling & Probing Services RW-4 (00990) 03/19/2015 T. Elder 0 Çħ 10 O Midlands

Midlands

Anvironmental

Consultants, Inc.

131 Dociey Road
Lexington, South Carolina, 20013
(803) 808-7043 fax, 808-7048 BLOWCOUNTS Penetration Blows Per Foot 20 40 60 RECORDED 90 100

Logged By: Driller: D. Brown Drilled By: Well Number: Date Drilled: MONITORING WELL INSTALLATION RECORD 4.0-INCH DIAMETER SCHEDULE 40 PVC PIPE GRADE -BENTONITE/PORTLAND CEMENT GROUT 10.0-INCH DIAMETER BOREHOLE HYDRATED BENTONITE PVC SCREEN -SAND PACK Environmental Drilling & Pobing Services RW-4 (00990) S.C. I.D. . B 02053 03/19/2015 T. Elder Island Car Wash Hilton Head Island, South Carolina SCDHEC Site ID* 00990 MECI Project Number 15-5118 DEPTH TO BASE OF GROUT SEAL Ø5 FT. DEPTH OF PVC SCREEN 3.0 FT TO 15.0 FT. Midlands Environmental Consultants, Inc. 23) Dooley Road Lexington South Carolina 25013 (803) 808-2043 fax, 808-2048 COVER ASSEMBLY WITH DEPTH TO TOP OF SAND IØ FT. TOTAL DEPTH OF WELL 150 FT

wei Driller, provide supervising driller's name:
Signed:
20. WATER WELL DRILLER'S CERTIFICATION: This well was drilled under my direction and this report is true to the best of my knowledge and belief
17538 Greenhill Road Charlotte, North Carolina 28278 Telephone No.: /U4-0U/-/329
19. WELL DRILLER: David Brown Address: (Print)
TYPE:
18. PUMP: D
Well Disinfected Yes No
17. NEAREST SOURCE OF POSSIBLE CONTAMINATION:
16. WELL GROUTED?
15. ARTIFICIAL FILTER (filter pack) Installed from 15.0 Effective size
Chemical Analysis Yes
Yield:
Pumping Test: Yes (please enclose)
Bottom of 13. STATIC WATER LEVEL 5.U4 13. FUMPING LEVEL Below Land Surface.
Sieve Analysis
Set Between:
PUBLIC SYSTEM NUMBER: 11. SCREEN: Type: Schedule 4 Slot/Gauge 0.015
0.0
10. CASING: ☐ Th Diam.: 4 Inch Type: ② PV
9. WELL DEPTH (completed)
8. USE:
7. PERMIT NOMBER:
Bureau of Water 2600 Bull Street, Columbia, SC 29201-1708; (803) 898-4300

COPY 1 MAIL TO SCOHEC, COPY 2 TO WELL OWNER, COPY 3 TO WELL DRILLER

DHEC 1903 (03/2004)

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TYPE: Mud Rotary Dug Cable loo!	5. REMARKS: RW-4	(Use a 2nd sheet if needed)	*Indicate Water Bearing Zones									(110) ye (110)	Tan & Grav SAND*	Grass	Formation Description		Grouted Depth: from	9	3. PUBLIC SYSTEM NAME: 00990	Latitude:	City: Hilton Head Island Zip: 29928-3	Name: Island Car Wash	2. LOCATION OF WELL:	Telephone: Work.	City: Columbia	Address: 2600 Bull Street	Name:	1. WELL OWNER INFORMATION:	
☐ Jetted☐ Air Rotary☐ Other☐															on on		ills Below	2	PU	Longitude:	l mam Hu		2		State: SC	eet (last)	;	TION:	
													14 5	0.5	of Stratum	Thickness	ft. to	2	BLIC SYSTER	••	ion Parkway Zip: 29928-3304		COUNTY: Beaufort		Z4p: (9	i		
☐ Bored ☐ Driven													15.0	0.5	691	s Depth to	7.7		PUBLIC SYSTEM NUMBER:		-3304		ufort		zip: 29201-1708	(1811)	•		2600 E
If D Level Driller, provide supervising driller's name:	Signed: Well Driller Date: 4/15/2015	20. WATER WELL DRILLER'S CERTIFICATION: This well was drilled under my direction and this report is true to the best of my knowledge and belief.	Charlotte, North Carolina 28278 Telephone No.: /U4-bU/-/329 Fax No.: 803-548-2233	19. WELL DRILLER: David Brown CERT. NO.: 02053 Address: (Print) 17538 Greenhill Road	Jet (shallow) Turbine Reciprocating Centrifugal	H.P. Volts Length of drop pipe ft. Capacity gpm	Well Disinfected ☐ Yes ☐ No Type: Amount:	17. NEAREST SOURCE OF POSSIBLE CONTAMINATION: n. direction	18. WELL GROUTED? ☑ Yes ☐ No ☐ Neat Cement ☐ Bentonite ☑ Bentonite/Cement ☐ Other	Effective size	resutts.	14. WATER QUALITY Chemical Analysis Yes No Bacterial Analysis Yes No	Yield:	ft. after hrs. Pumping G.P.M. Pumping Test: Yes (please enclose) No	13. PUMPING LEVEL Below Land Surface.	6.17	Set Between: 3.0 ft. and 12.0 ft. NOTE: MULTIPLE SCREENS tt. and ft. use second sheet Sieve Analysis Yes (please enclose) No		11. SCREEN: Type: Schedule 40 PVC Diam.:	3.0ft. depth	□ PVC □ Galvanized	IG: Threaded Welded Inch	15.0 ft.	9. WELL DEPTH (completed) Date Started: 3/19/2015		8. USE:	UMW-22890	7. PERMIT NUMBER: TTAKE 25800	Water Well Record Bureau of Water 2600 Bull Street, Columbia, SC 29201-1708; (803) 898-4300

COPY 1 MAIL TO SCDHEC, COPY 2 TO WELL OWNER, COPY 3 TO WELL DRILLER

DHEC 1903 (03/2004)